

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 2:15-cr-04268-JB

ANGEL DELEON, et al.,

Defendants.

**UNOPPOSED MOTION TO EXTEND TIME TO FILE MOTIONS PURSUANT TO
RULE 16**

Defendant Perez, by his counsel, requests the Court enter an Order extending the time within which all Defendants and the United States have to file Fed. R. Crim. P. 16 discovery motions, including motions to compel.

1. This Court's Fourth Scheduling Order requires motions pursuant to Fed. R. Crim. P. 16 to be filed by September 1, 2017. *See* Doc. 1205, ¶ 2.

2. Defendants have several outstanding discovery requests to the United States. The United States and Defendants are working to resolve these disputes without the need to file motions. The parties believe many of these disputes can be resolved.

3. Defendant Perez has requested a variety of information that may be in the custody of the Department of Corrections and the United States needs time to locate the information and if no dispute as to its discoverability exists, produce it.

4. Defendants Baca, Troup, Billy Garcia and Joe Gallegos are currently attempting to negotiate disputed discovery and need additional time.

5. In addition, a number of items that were the subject of Rule 16 motions that were heard by the Court beginning on May 19, 2017 and thereafter, for which the Court ordered the government to produce, or the government agreed to produce, have yet to be produced.

6. The parties are working to identify these items and determine why they have not been produced without the need for court intervention.

7. Accordingly, Defendants request a two-week extension of the September 1, 2017 deadline to file motions pursuant to Rule 16, including motions to compel. The new deadline would be September 15, 2017. Responses would then be due September 29, 2017, and replies, if any, October 13, 2017.

8. Counsel for all remaining Defendants do not oppose this request. Counsel for the Government, by Maria Armijo, does not oppose.

Respectfully submitted,
THE LAW OFFICE OF RYAN J. VILLA

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent via the Court's CM/ECF system on, this 31st day of August, 2017, which caused counsel of record for all parties to receive a copy of this Motion electronically.

/s/ Ryan J. Villa

Ryan J. Villa